

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CTN Holdings, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10603 (TMH)

(Joint Administration Requested)

**NOTICE OF (I) FILING OF CHAPTER 11  
PETITIONS AND RELATED DOCUMENTS AND  
(II) SECOND AMENDED<sup>2</sup> AGENDA FOR HEARING  
SCHEDULED FOR APRIL 2, 2025 AT 2:00 P.M.  
(EASTERN TIME)**

**THIS PROCEEDING WILL BE CONDUCTED BY ZOOM, AND  
IN-PERSON FOR LOCAL COUNSEL. COURTROOM NO. 6, FIFTH FLOOR  
824 MARKET STREET, WILMINGTON, DELAWARE.**

Please refer to Judge Horan's Chambers Procedures and the Court's website (<https://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Horan's expectations of remote participants, and the advance registration requirements. Registration is required by **1:00 p.m. (Eastern time) (one-hour prior to the hearing)** unless otherwise noticed using the eCourt Appearances tool ([available here](#)) available on the Court's website.

**PLEASE TAKE NOTICE** that, on March 30, 2025, the above-captioned debtors and debtors in possession (the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"). The Debtors have filed a motion requesting that their cases be consolidated for procedural purposes only and administered jointly. The Debtors continue

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are CTN Holdings, Inc. (9122); CTN SPV Holdings, LLC (8689); Catona Climate Solutions, LLC (3375); Make Earth Green Again, LLC (4441); Aspiration QFZ, LLC (1532); Zero Carbon Holdings, LLC (1679); Aspiration Fund Adviser, LLC (4214). The Debtors' mailing address is 548 Market Street, PMB 72015, San Francisco, CA 94101-5401.

<sup>2</sup> Amended agenda items appear in bold.

to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The automatic stay of section 362(a) of the Bankruptcy Code is in effect.

**PLEASE TAKE FURTHER NOTICE** that a hearing with respect to the following first day motions (collectively, the “First Day Motions”) is scheduled for April 2, 2025 at 2:00 p.m. (Eastern Time) (the “First Day Hearing”) before The Honorable Thomas M. Horan, United States Bankruptcy Judge for the District of Delaware. The First Day Hearing will be conducted by Zoom, and in-person for local counsel, **824 Market Street, Courtroom No. 6, 5<sup>th</sup> Floor, Wilmington, Delaware.**

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the First Day Motions may be made at the First Day Hearing.

1. **VOLUNTARY PETITIONS:**

- a. CTN Holdings, Inc. Voluntary Petition ([Case No. 25-10603](#))
- b. CTN SPV Holdings, LLC Voluntary Petition ([Case No. 25-10604](#))
- c. Catona Climate Solutions, LLC Voluntary Petition ([Case No. 25-10605](#))
- d. Make Earth Green Again, LLC Voluntary Petition ([Case No. 25-10607](#))
- e. Aspiration QFZ, LLC Voluntary Petition ([Case No. 25-10609](#))
- f. Zero Carbon Holdings, LLC Voluntary Petition ([Case No. 25-10611](#))
- g. Aspiration Fund Adviser, LLC Voluntary Petition ([Case No. 25-10613](#))

**FIRST DAY PLEADINGS GOING FORWARD:**

2. Debtors’ Motion for Entry of Order Directing Joint Administration of Related chapter 11 Cases [[Docket No. 3](#); filed March 31, 2025]

Status: This matter is going forward.

3. Debtors’ Application for Appointment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date [[Docket No. 4](#); filed March 31, 2025]

**Related Document: Notice of Filing of Amended Verita Global Engagement Agreement**  
**[[Docket No. 32](#); filed April 2, 2025]**

Status: This matter is going forward.

4. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Existing Cash Management System, (B) Pay or Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Their Bank Accounts, Existing Business Forms, Corporate Card Program, and (D) Implement Changes to the Existing Cash Management System as Necessary, (II) Waiving Deposit and Investment Requirements, (III) Allowing Intercompany Transactions and Affording Administrative Expense Priority to Post-Petition Intercompany Claims, and (IV) Granting Related Relief [[Docket No. 5](#); filed March 31, 2025]

Status: This matter is going forward.

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, but Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Maintain Employee Benefits Programs and (II) Granting Related Relief [[Docket No. 6](#); filed March 31, 2025]

Status: This matter is going forward.

6. Debtors' Motion for Entry of Interim and Final Orders Establishing Notification and Hearing Procedures for, and Approving Restrictions on, Certain Acquisitions or Transfers of, and Declarations of Worthlessness with Respect to, Interests in the Debtors' Estates [[Docket No. 8](#); filed March 31, 2025]

Status: This matter is going forward.

7. Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Seal Certain Personally Identifiable Information for Individuals and (II) Granting Related Relief [[Docket No. 9](#); filed March 31, 2025]

Status: This matter is going forward.

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Term Loan Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing and (VI) Granting Related Relief [[Docket No. 21](#); filed March 31, 2025]

Status: This matter is going forward.

#### **DECLARATION IN SUPPORT OF FIRST DAY PLEADINGS**

9. Declaration of Miles Staglik in Support of Chapter 11 Petitions and First Day Relief [[Docket No. 22](#); filed March 31, 2025]

Dated: April 2, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ William F. Taylor, Jr.

**WHITEFORD, TAYLOR & PRESTON LLC<sup>3</sup>**

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*Proposed Counsel to the Debtors and Debtors in Possession*

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<sup>3</sup> Whiteford, Taylor & Preston operates as Whiteford, Taylor & Preston LLC in Delaware.